

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B147032690

FACILITY: NEENAH PAPER - MICHIGAN INC		SRN / ID: B1470
LOCATION: 501 E MUNISING AVE, MUNISING		DISTRICT: Upper Peninsula
CITY: MUNISING		COUNTY: ALGER
CONTACT: NATALIE KENTNER, ENVIRONMENTAL ENGINEER		ACTIVITY DATE: 12/21/2015
STAFF: Joel Asher	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Annual inspection. Full Compliance Evaluation.		
RESOLVED COMPLAINTS:		

On 12/21/2015 an unannounced inspection was performed at this facility. My contacts were Mr. Larry Passinault and Ms. Natalie Kentner. Mr. Passinault is the facility's environmental engineer. He is transitioning into retirement but will be with the facility for another 12 months or so. Ms. Kentner will be Mr. Passinault's replacement. She has been at the facility for about 4 months.

The facility continues to operate under their ROP, MI-ROP-B1470-2013. The processes at the facility have remained the same. A brief discussion was held regarding the Renewable Operating Permit (ROP) system and the Compliance Monitoring Strategy (CMS) which dictates the inspection frequency. A review of the ROP shows it was issued on January 7, 2013 and will expire on January 7, 2018. Discussions were held regarding the renewal process and the need for the Permit Shield. Ms. Kentner stated she was aware of the issues.

#### EU05

This is Boiler #1 which is controlled by a baghouse. EU05.III.1 requires implementing corrective action if less than 3 of the 5 baghouse modules are operating. So far this has not happened in 2015. If this were to occur, the baghouse would go into bypass mode, and an incident report would be created. The unit is always run with all 5 modules in operation. In July of this year all bags in the baghouse were replaced (5 modules x 144 bags per module).

EU05 V.1 requires the facility to perform a stack test for particulate matter within three years of issuance of the ROP. This would require testing to be completed by January 7, 2016. Mr. Passinault explained they are installing a spray dry absorber to be in compliance with the Boiler MACT (covered under PTI 24-15), this will be completed by January 31, 2016. They plan to request an extension of the testing date so as to do the compliance test for the ROP and the Boiler MACT at the same time.

EU05 VI.1 requires the facility to carry out an Inspection and Maintenance Program for the equipment associated with EU05. This program is operated for preventative maintenance and maintenance issues as they arise. The preventative maintenance activities are automatically listed for each week as recommended by vendors. Any repair needs can be entered into the system by the operators as needed. The boiler operators also have a daily log book that is maintained to document any upsets or irregular operations as they happen. A printout of the Inspection and Maintenance records for June of 2015 was obtained.

EU05 VI.2 requires the facility to monitor and record the fuel sulfur content. The facility is limited to 1.5% sulfur content. The facility received three boat loads of coal during 2015. The facility conducted a sulfur content analysis for each delivery: May 19, .8%; July 16, .83%; and October 23, .75%). Records of the analysis were obtained.

EU05 VI.3 requires the facility to operate a Continuous Opacity Monitoring System (COMS) for the baghouse. This generates an automatic report of any opacity >20%.

#### EU15

EU15 VI.1 has the same fuel sulfur content and reporting as EU05.

This emission unit also has a sulfur content limit on the fuel oil. No fuel oil has been purchased for the unit since at least 2004. In the event fuel oil would be purchased in the future, the fuel supplier is aware of the sulfur limit restriction.

**EUCOATER**

EUCOATER V.1 requires the facility to conduct particulate emissions testing within three years from the issuance of MI-ROP-B1470-2013. The facility will be requesting an extension of the testing date for the same reasons specified in the description of EU05 V.1.

EUCOATER VI.1 requires the facility to monitor and record the paper machine feed rate on a continuous basis. This is done by calculating the specific formulation run on the paper machine by the speed the machine is run.

EUCOATER VI.2 requires the facility to obtain and keep records of emissions and VOC content of all applied coatings. The facility has more than 200 coatings and formulations. They maintain compliance with this requirement by reviewing all formulas that are run on the paper machine for HAPS prior to allowing them to be run in the facility. All formulas are determined to be in compliance with permitted limits prior to allowing them to be used in production.

**FGCOLDCLEANERS**

The facility presently has three cold cleaners on site. One in the maintenance shop, one in the mechanic's shop, and one in the old shop. All are small and store all cleaning solvents inside. No solvents are left in the open when not in use.

**FGRULE287(c)**

The only emission unit in FGRULE287(c) is EUPAINTBOOTH. This emission unit has been removed. This will be removed from the ROP upon the next renewal.

No complains have been filed regarding the facility and no issues were observed.

At the time of this inspection the facility was found to be in compliance with all requirements specified in MI-ROP-B1470-2013.

NAME 

DATE 12/29/15

SUPERVISOR \_\_\_\_\_